

JONES DAY

250 VESEY STREET • NEW YORK, NEW YORK 10281.1047
TELEPHONE: +1.212.326.3939 • FACSIMILE: +1.212.755.7306

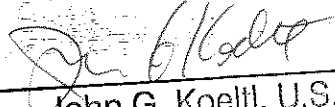
DIRECT NUMBER: (212) 326-8338
MWLAMPE@JONESDAY.COM

October 14, 2021

CM/ECF

The Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007

APPLICATION GRANTED
SO ORDERED

10/15/21

John G. Koeltl, U.S.D.J.

Re: Chandler v. International Business Machines Corporation, No. 1:21-cv-06319-JGK

Dear Judge Koeltl:

On behalf of Defendant International Business Machines Corp. ("IBM"), I write to inform the Court that Plaintiff has agreed to IBM's proposal on redaction and sealing contained in the letter filed earlier today (ECF No. 23). Therefore, IBM requests – and Plaintiff consents – that the Court order (i) the parties to meet and confer on sealing and redaction of the summary judgment filings, (ii) that no party may file in the public record any material as to which there is a dispute about sealing and redaction until the Court resolves such dispute, and (iii) that in the event of a dispute, the party claiming confidentiality must submit a letter to the Court to justify its position within 3 business days after a live telephone meet-and-confer call on these issues.

Respectfully submitted,

/s/ Matthew W. Lampe

Matthew W. Lampe

cc: Shannon Liss-Riordan, Esq.